

Axiall Corporation Eagle Natrium LLC PO Box 191 New Martinsville, WV 26155

J. Thomas Horan Manager Environmental Telephone: (304) 455-2200 ext. 3310 Fax: (304) 455-2422

Tom. Horan@axiall.com



February 17, 2017

Via Overnight Mail

William F. Durham, Director WV DEP, Division of Air Quality 601 57th Street, SE Charleston, WV 25304-2345

Dear Mr. Durham:

Subject: Permit Application for Ware Inc. Rental Boiler, Axiall Corporation, Eagle

Natrium LLC

Please find enclosed a permit modification application to install and operate a rental boiler at the Eagle Natrium LLC, Natrium facility. The rental boiler will be operated utilizing natural gas. Enclosed are two copies of the application and a check for \$4,500.00 to cover the application fee.

If you have any questions regarding this information, please call me at (304) 455-2200, extension 3310.

Sincerely,

J. Thomas Horan

Manager Environmental

Attachment:

Jesse D. Adkins, Assistant Director WV DEP, Division of Air Quality 601 57th Street, SE

Charleston, WV 25304-2345

WEST VIRGINIA DEPARTMENT OF **ENVIRONMENTAL PROTECTION**

DIVISION OF AIR QUALITY

601 57th Street, SE

APPLICATION FOR NSR PERMIT AND

(304) 926-0475	TITLE V PERMIT REVISION
www.dep.wv.gov/dag	(OPTIONAL)
PLEASE CHECK ALL THAT APPLY TO NSR (45CSR13) (IF KNC	WN): PLEASE CHECK TYPE OF 45CSR30 (TITLE V) REVISION (IF ANY):
☐ CONSTRUCTION ☐ MODIFICATION ☐ RELOCATION	☐ ADMINISTRATIVE AMENDMENT ☐ MINOR MODIFICATION
☐ CLASS I ADMINISTRATIVE UPDATE ☐ TEMPORARY	SIGNIFICANT MODIFICATION
CLASS II ADMINISTRATIVE UPDATE AFTER-THE-FA	IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS ATTACHMENT S TO THIS APPLICATION
FOR TITLE V FACILITIES ONLY: Please refer to "Title V R (Appendix A, "Title V Permit Revision Flowchart") and at	levision Guidance" in order to determine your Title V Revision options will be to operate with the changes requested in this Permit Application.
Secti	ion I. General
 Name of applicant (as registered with the WV Secretary Eagle Natrium, LLC 	of State's Office): 2. Federal Employer ID No. (FEIN): 25-0730780
3. Name of facility (if different from above):	4. The applicant is the:
	☑ OWNER ☐ OPERATOR ☐ BOTH
5A. Applicant's mailing address: P. O. Box 191 New Martinsville, WV 26155-0191	5B. Facility's present physical address: 15696 Energy Road Proctor, WV26055
change amendments or other Business Registration Ce	ion/Organization/Limited Partnership (one page) including any name entificate as Attachment A.
7. If applicant is a subsidiary corporation, please provide the	e name of parent corporation:
8. Does the applicant own, lease, have an option to buy or o	otherwise have control of the <i>proposed site?</i> 🖂 YES 🔲 NO
 If YES, please explain: Applicant owns site. 	
If NO, you are not eligible for a permit for this source.	
 Type of plant or facility (stationary source) to be construent administratively updated or temporarily permitted (excrusher, etc.): Temporary Boiler 	ucted, modified, relocated, .g., coal preparation plant, primary (NAICS) code for the facility:
11A. DAQ Plant ID No. (for existing facilities only): 051-00002	B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R14-0027D R30-05100002-2013

All of the required forms and additional information can be	e found under the Permitting Section of Da	AQ's website, or requested by phone.
12A.		
 For Modifications, Administrative Updates or Te present location of the facility from the nearest state 	mporary permits at an existing facility, e road;	please provide directions to the
 For Construction or Relocation permits, please proad. Include a MAP as Attachment B. 	provide directions to the proposed new s	tite location from the nearest state
The facility is located along WV State Route 2 appro	oximately 5 miles north of New Martinsv	ille, WV.
12.B. New site address (if applicable):	12C. Nearest city or town:	12D. County:
	New Martinsville	 Marshall
12.E. UTM Northing (KM): 4399.6	12F. UTM Easting (KM): 512.70	12G. UTM Zone: 17
 Briefly describe the proposed change(s) at the facilit This will be a temporary Boiler installed to produce 	steam	
Provide the date of anticipated installation or change If this is an After-The-Fact permit application, provided that the provided Happen: / /		14B. Date of anticipated Start-Up if a permit is granted: 05/17/2017
14C. Provide a Schedule of the planned Installation of <i>I</i> application as Attachment C (if more than one unit		units proposed in this permit
15. Provide maximum projected Operating Schedule of Hours Per Day 24 Days Per Week 7	f activity/activities outlined in this applica Weeks Per Year 52	ation:
16. Is demolition or physical renovation at an existing fac-	cility involved? 🛛 YES 🔲 NO	
17. Risk Management Plans. If this facility is subject to	112(r) of the 1990 CAAA, or will become	e subject due to proposed
changes (for applicability help see www.epa.gov/cepp	o), submit your Risk Management Pla r	(RMP) to U. S. EPA Region III.
18. Regulatory Discussion. List all Federal and State a	ir pollution control regulations that you b	pelieve are applicable to the
proposed process (if known). A list of possible applica	ble requirements is also included in Atta	achment S of this application
(Title V Permit Revision Information). Discuss applical	oility and proposed demonstration(s) of	compliance (if known). Provide this
information as Attachment D.		
Section II. Additional atta	achments and supporting do	ocuments.
19. Include a check payable to WVDEP - Division of Air (
45CSR13).		
20. Include a Table of Contents as the first page of you	r application package.	
 Provide a Plot Plan, e.g. scaled map(s) and/or sketch source(s) is or is to be located as Attachment E (Re 	th(es) showing the location of the proper fer to <i>Plot Plan Guidanc</i> e) .	ty on which the stationary
 Indicate the location of the nearest occupied structure 		
 Provide a Detailed Process Flow Diagram(s) show device as Attachment F. 	ing each proposed or modified emission	s unit, emission point and control
23. Provide a Process Description as Attachment G.		
 Also describe and quantify to the extent possible a 	Il changes made to the facility since the	last permit review (if applicable).

All c	of the required forms and additional info	rmation can be found under the P	ermitting Section of DAQ's website, or requested by phone.
24.	Provide Material Safety Data Sheets	(MSDS) for all materials proces	ssed, used or produced as Attachment H.
	For chemical processes, provide a MSE		•
	Fill out the Emission Units Table and		
26.	Fill out the Emission Points Data Su	mmary Sheet (Table 1 and Tab	ole 2) and provide it as Attachment J.
	Fill out the Fugitive Emissions Data		
28.	Check all applicable Emissions Unit I	Data Sheets listed below:	
□E	Bulk Liquid Transfer Operations	☐ Haul Road Emissions	☐ Quarry
	Chemical Processes	☐ Hot Mix Asphalt Plant	☐ Solid Materials Sizing, Handling and Storage
	Concrete Batch Plant	☐ Incinerator	Facilities
	Grey Iron and Steel Foundry		☐ Storage Tanks
	General Emission Unit, specify		
	out and provide the Emissions Unit Da		
29.	Check all applicable Air Pollution Cor	ntrol Device Sheets listed below	w:
	Absorption Systems	☐ Baghouse	☐ Flare
l	Adsorption Systems	Condenser	☐ Mechanical Collector
	Afterburner	☐ Electrostatic Precipitate	tor Wet Collecting System
	Other Collectors, specify		
	out and provide the Air Pollution Cont		
	Provide all Supporting Emissions Ca Items 28 through 31.	alculations as Attachment N, or	r attach the calculations directly to the forms listed in
	Monitoring, Recordkeeping, Reporti testing plans in order to demonstrate capplication. Provide this information as	compliance with the proposed em	proposed monitoring, recordkeeping, reporting and nissions limits and operating parameters in this permit
	Please be aware that all permits must measures. Additionally, the DAQ may are proposed by the applicant, DAQ wi	not be able to accept all measur	ner or not the applicant chooses to propose such res proposed by the applicant. If none of these plans de them in the permit.
32.	Public Notice. At the time that the ar	oplication is submitted, place a C	Class I Legal Advertisement in a newspaper of general
1	circulation in the area where the source	e is or will be located (See 45CS	SR§13-8.3 through 45CSR§13-8.5 and Example Legal
	Advertisement for details). Please su	ubmit the Affidavit of Publicatio	on as Attachment P immediately upon receipt.
33.	Business Confidentiality Claims. Do	oes this application include confi	dential information (per 45CSR31)?
	☐ YES	⊠ NO	
;	segment claimed confidential, including Notice - Claims of Confidentiality" g	g the criteria under 45CSR§31-4 guidance found in the General In	
	Sec	ction III. Certification o	f Information
	Authority/Delegation of Authority. Check applicable Authority Form belo		ner than the responsible official signs the application.
ПА	authority of Corporation or Other Busine	ess Entity /	Authority of Partnership
ПА	authority of Governmental Agency		Authority of Limited Partnership
	mit completed and signed Authority Fo		,
			ermitting Section of DAQ's website, or requested by phone.
	Tale Toquires forme and additional finor	madon can be round under the re	similarly Section of DAG 5 website, of requested by priorie.

35A. Certification of Information. To certify 2.28) or Authorized Representative shall check		cial (per 45CSR§13-2.22 and 45CSR§30-
Certification of Truth, Accuracy, and Comp	leteness	
I, the undersigned Responsible Official / [application and any supporting documents appreasonable inquiry I further agree to assume restationary source described herein in accordar Environmental Protection, Division of Air Quali and regulations of the West Virginia Division of business or agency changes its Responsible Conotified in writing within 30 days of the official of	pended hereto, is true, accurate, and compesponsibility for the construction, modificating with this application and any amendmently permit issued in accordance with this application and W.Va. Code § 22-5-1 et sufficial or Authorized Representative, the D	lete based on information and belief after ton and/or relocation and operation of the ents thereto, as well as the Department of plication, along with all applicable rules eq. (State Air Pollution Control Act). If the
Compliance Certification		
Except for requirements identified in the Title V that, based on information and belief formed a compliance with all applicable requirements.		
SIGNATURE (Please	use blue ink)	DATE: 2/17/17 (Please use blue ink)
35B. Printed name of signee: Jerry Mullens	iso bioc ilinj	35C. Title: Works Manager
335. I Timed harne of signee. Serry Muliens		330. Title. Works Wanager
35D. E-mail: jerry.mullens@axiall.com	36E. Phone: (304) 455-2200 X 3221	36F. FAX: (304) 455-6927
36A. Printed name of contact person (if different	nt from above): Tom Horan	36B. Title: Environmental Manager
36C. E-mail: tom.horan@axiall.com	36D. Phone: (304) 455-2200 X 3310	36E. FAX: (304) 455-2422
PLEASE CHECK ALL APPLICABLE ATTACHMEN	TS INCLUDED WITH THIS PERMIT APPLICAT	ION:
Attachment A: Business Certificate Attachment B: Map(s) Attachment C: Installation and Start Up Schell Attachment D: Regulatory Discussion Attachment E: Plot Plan Attachment F: Detailed Process Flow Diagram Attachment G: Process Description Attachment H: Material Safety Data Sheets (N Attachment I: Emission Units Table Attachment J: Emission Points Data Summar Please mail an original and three (3) copies of the address listed on the first. Attachment Discussion Points Data Summar	Attachment L: Emissions dule	tion Control Device Sheet(s) ng Emissions Calculations ng/Recordkeeping/Reporting/Testing Plans ntice Confidential Claims Forms mit Revision Information ture(s) to the DAQ, Permitting Section, at the
☐ NSR permit writer should notify Title N☐ For Title V Significant Modifications processe☐ NSR permit writer should notify a Title	V Permitting Group and: / permit writer of draft permit, opriate notification to EPA and affected state / permit writer of draft permit. d in parallel with NSR Permit revision: e V permit writer of draft permit,	es within 5 days of receipt,
☐ Public notice should reference both 4.	•	

Table of Contents

- 1. Attachment A Business Certificate
- 2. Attachment C Installation and Startup Schedule
- 3. Attachment D Regulatory Discussion
- 4. Attachment E- Plot Plan
- 5. Attachment F Process Block Flow Diagram
- 6. Attachment G Process Description
- 7. Attachment I Emissions Units Table
- 8. Attachment J Emissions Points Data Summary Sheet
- 9. Attachment K Fugitive Emissions Data Sheet
- 10. Attachment L Emissions Unit Data Sheet
- 11. Attachment N Supporting Emissions Calculations
- 12. Attachment O Monitoring, Recordkeeping, Reporting and Testing Plans
- 13. Attachment P Public Notice

ATTACHMENT A

WEST VIRGINIA STATE TAX DEPARTMENT BUSINESS REGISTRATION CERTIFICATE

ISSUED TO: EAGLE
NATRIUM LLC STATE
ROUTE 2
NEW MARTINSVILLE, WV 26155-0000

BUSINESS REGISTRATION ACCOUNT NUMBER:

2276-8329

This certificate is issued on:

03/1/2013

This certificate is issued by the West Virginia State Tax Commissioner in accordance with Chapter 11, Article 12, of the West Virginia Cod€

The person or organization identified on this certificate is registered to conduct business in the State of West Virginia at the location above.

This c;:ertificate is not transferrable and must be displayed at the location for which issued This certificate shall be permanent until cessation of the business f9r which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them. CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia.

#1006 v.4 11877588864

Attachment C Installation and Start-up Schedule

Installation activities will begin immediately after Permit approval and will take approximately 3-4 weeks. Following piping modifications, electrical connections, and installation is complete, tuning and training will last approximately one week. Therefore, startup for operations is expected within one month of permit approval.

Attachment D Regulatory Discussion

The Ware Inc. Rental Boiler will be located in the Power Department. This rental boiler is expected to be in use until a new project to convert the previously shutdown Coal-fired Boiler 4 is converted to a natural gas fired boiler which is expected to be more than 12 months. A separate application will be submitted for Boiler 4 conversion and will incorporate a comprehensive PSD netting calculation to account for all contemporaneous increases and decreases in the plant.

Applicable and non-applicable regulations discussed in this attachment include the following:

- 1. 45 CSR 14 Prevention of Significant Deterioration (PSD)
- 2. 40 CFR Part 60 New Source Performance Standards (NSPS)
 - a. 40 CFR Part 60 Subpart D, Standards of Performance for Fossil Fuel Fired Steam Generators for Which Construction is Commenced After August 19, 1971
 - b. 40 CFR Part 60 Subpart Da, Standard of Performance for Fossil Fuel Fixed Steam Generators for Which Construction is Commenced After August 19, 1971
 - c. 40 CFR Part 60 Subpart Db, Standards of Performance for Industrial Commercial Institutional Steam Generating Units
 - d. 40 CFR Part 60 Subpart Dc, Standards of Performance for Fossil Fuel Fixed Steam Generators for Which Construction is Commenced After August 19, 1971
- 3. 45 CSR 2 To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers
- 4. 45 CSR 10 To Prevent and Control Air Pollution from the Emission of Sulfur Oxides
- 5. 45 CSR 40 Control of Ozone Season Nitrogen Oxides Emissions
- 6. 40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial Commercial/Institutional Boiler and Process Heater
- 1. 45 CSR 14 Prevention of Significant Deterioration (PSD)

The Ware Inc. Rental Boiler's maximum proposed emissions for NOx is 15.97 ton/yr which is below the PSD trigger of 40 ton/yr. The maximum proposed emissions for CO is 32.82 ton/yr which is below the PSD trigger of 100 ton/yr. Therefore, this boiler does not trigger PSD and 45CSR14 does not apply. See Table D-1 for proposed emissions.

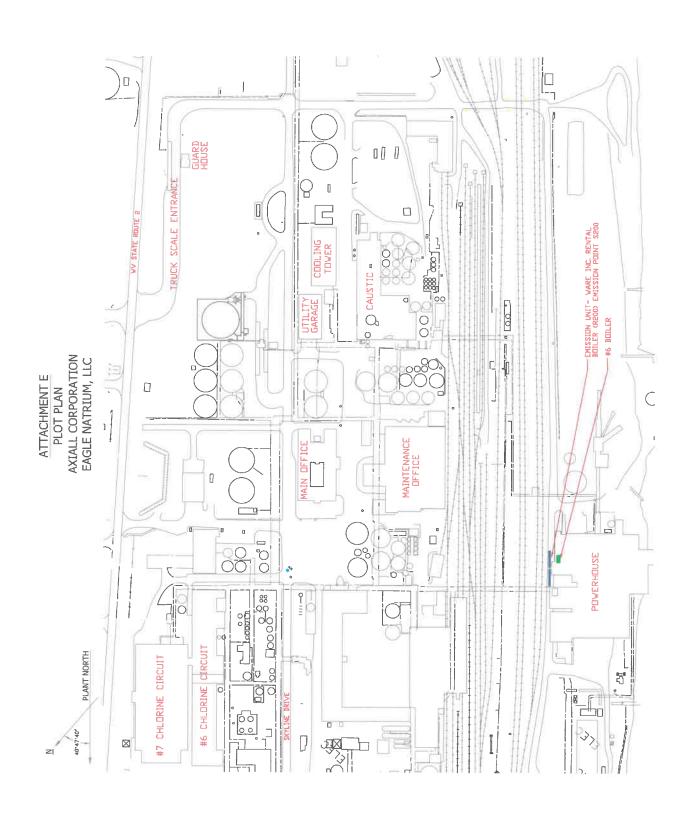
Table D-1
Emissions Calculations for Ware Rental Boiler
Natural Gas, 99.9 mmBtu/hr, 8760 Annual hours of operation)

Pollutant	Emission Factor Ibs/MMBtu	Propose Emission		PSD Criteria Limit, tons/yr	Exceed Criteria Limit (Yes/No)
	(provided by Manufacturer)	lb/hr	tons/yr		
NOx	0.0365	3.646	15.97	40	No
СО	0.075	7.493	32.82	100	No
SO ₂	NA	-	-	40	No
PM	0.005	0.5	2.19	25	No
PM ₁₀	0.005	0.5	2.19	15	No
PM _{2.5}	0.005	0.5	2.19	10	No
VOC	0.004	0.4	1.75	40	No
CO ₂	117.65 (AP42)	11,698	51,237	75,000	No

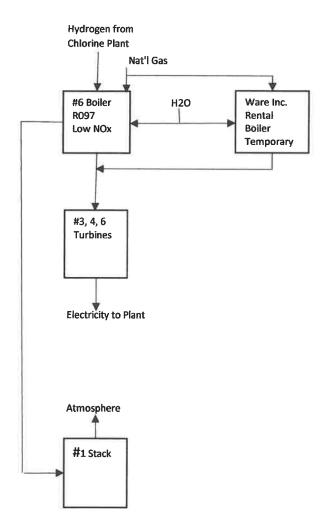
2. 40 CFR Part 60 New Source Performance Standards (NSPS)

- a. 40 C.F.R 60, Subpart D Standards of Performance for Fossil Fuel Fired Steam Generators for Which Construction is Commenced After August 19, 1971. The maximum design heat input of the Ware Temporary Boiler is 99.9 mmBtu/hr. The maximum design heat input is less than the applicable threshold of 250 mmBtu/hr. Therefore, this boiler is not applicable to this subpart.
- b. **40 C.F.R 60 Subpart Da** Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After August 19, 1971. Applies to Electrical Utility Steam Generating Units only. This unit is classified as a non-electrical utility steam generating unit and is not applicable to this subpart.
- c. **40 CF.R. 60, Subpart Db** Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. Applies to Steam Generating Units greater than 100 mmBtu/hr. This Ware Temporary boiler is rated below 100mmBtu/hr. Therefore, it is not applicable to this subpart.
- d. **40 C.F.R 60 Subpart Dd** Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. This Subpart is applicable as the unit is less than 100mmBtu/hr. This portable unit is expected to be installed for greater than 180 days and therefore, does not meet the definition of Temporary Boiler per this subpart. These units will burn natural gas only and the Pollutant SO2 is significantly less than 0.20 lb/mmBtu, therefore monitoring is not required.
- 3. **45 CSR 2** To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers Both Boilers are subject to this rule. Since the boiler only combusts natural gas there will be no required testing or monitoring for this unit.

- **4. 45 CSR 10** *To Prevent and Control Air Pollution from the Emission of Sulfur Oxides* The Boiler is subject to this rule. Since the Boiler combusts only natural gas there will be no required testing or monitoring for these units.
- 5. 45 CSR 40 Control of Ozone Season Nitrogen Oxides Emissions The design of the Boiler is less than 100 mmBtu/hr which is less than the applicability threshold of 250 mmBtu/hr. Therefore this rule does not apply.
- 6. 40 C.R.F 63, Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial-Commercial-Institutional Boiler and Process Heaters This facility is a major source of Hazardous Air Pollutants (HAP). The unit is not considered temporary per the definition of this subpart. The unit will be required to comply with the work practice standards for the Gas 1 fuel. Therefore, a one-time energy assessment and periodic tune-up will be conducted. This unit has an oxygen trim.



Attachment F Process Flow Diagram #6 Boiler and Ware Inc. Rental Boiler



Attachment G

Process Description

A 75,000 pph trailer mounted B&W natural gas fired boiler will be temporarily installed at the plant. This is a superheated boiler designed for 750 psi, 750 deg F. The boiler will be supplied from a feedwater/deaerator skid and will discharge into our existing 175# steam header. Predicted emissions are 30 ppm NOx and 100 ppm CO (corrected to 3% O2). Pressure relief and pressure reducing valves will be utilized. The feedwater/deaerator skid will be supplied from the plant's existing boiler feed water supply. A 75,000 pph economizer and de-super heater will also be used to support the operation.

Attachment I

Emission Units Table

(includes all emission units and air pollution control devices that will be part of this permit application review, regardless of permitting status)

Emission Unit ID¹	Emission Point ID ²	Emission Unit Description	Year Installed/ Modified	Design Capacity	Type ³ and Date of Change	Control Device 4
R200	S200	Ware Inc. Rental Boiler	2017	99.7 mmBtu/hr	Temporary 2017	NA

¹ For Emission Units (or <u>Sources</u>) use the following numbering system:1S, 2S, 3S,... or other appropriate designation. ² For <u>E</u>mission Points use the following numbering system:1E, 2E, 3E, ... or other appropriate designation.

³ New, modification, removal

⁴ For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

EMISSION POINTS DATA SUMMARY SHEET

	-										
	Emission Concentratio n ⁷ (ppmv or ma/m ⁴)										
	Est. Method Used ⁶		EE	EE	EE	田田	EE	BE	EE	EE	
	Emission Form or Phase (At exit	conditions, Solid, Liquid or Gas/Vapor)	Gas/Vapor	Gas/Vapor	Gas/Vapor	Gas/Vapor	Gas/Vapor	Gas/Vapor	Gas/Vapor	Gas/Vapor	
	Potential olled ions 5	ton/yr	32.82	15.97	6.57	1.75	51,344	51,237	86.0	0.28	
	Maximum Potential Controlled Emissions ⁵	lb/hr	7.493	3.646	1.5	0.4	11,722	11,698	0.225	0.063	
	Maximum Potential Uncontrolled Emissions 4	ton/yr									
	Maximum Potential Uncontrolle Emissions	lb/hr		1				:::::::			
Table 1: Emissions Data	All Regulated Pollutants - Chemical Name/CAS ³	(Speciate VOCs & HAPS)	CO / 630-08-0	NOx /11104-93-4	PM	VOC	CO2e	CO2/128-38-9	CH4 /74-82-8	N2O/10024-97-2	
le 1: En	Vent Time for Emission Unit (chemical processes only)	Max (hr/yr)									
Tab	Vent T Emissi (che process	Short Term ²	၁								
	Air Pollution Control Device (Must match Emission Units Table & Plot Plan)	Device Type	Low	NOX	Dailleis						
	Air Po Control (Must Emission &	ID No.	CD200 Low								
	Emission Unit Vented Through This Point (Must match Emission Units Table & Plot Plan)	Source	Ware Inc.	Rental Boiler							
	Emissior Throug (Must ma Units Tab	ID No.	R200								
	Emission Point Type ¹		Stack								
	Emission Point ID No. (Must match Emission Units Table	& Plot Plan)	S200								

be fuglitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fuglitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to

¹ Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.

2 Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).

4 Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 3 List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS2, VOCs, H₂S, Inorganics, Lead, Organics, O3, NO, NO2, SO2, SO2, all applicable Greenhouse Gases (including CO2 and methane), etc. DO NOT LIST H2, H2O, N2, O2, and Noble Gases.

⁵ Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch) minute batch).

Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify)

7 Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric)

use units of milligram per dry cubic meter (mg/m³) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO₂, use units of ppmv (See 45CSR10),

Attachment J EMISSION POINTS DATA SUMMARY SHEET

	_		_	_	-	_	_	-	 _	_	_	
	tes (km)	Easting	542554						E#.			
	UTM Coordinates (km)	Northing	4399640									
	evation (ft)	Stack Height ² (Release height of emissions above ground level)	27									
ter Data	Emission Point Elevation (ft)	Ground Level (Height above mean sea level)	059									
sase Parame		Velocity (fps)	30.86									
Table 2: Release Parameter Data	Exit Gas	Volumetric Flow 1 (acfm) at operating conditions	~23,583									
		Temp.	~350									
	Inner	(ft.)	5.00									
	Emission	No. (Must match Emission Units Table)	S200									

¹Give at operating conditions. Include inerts. ² Release height of emissions above ground level.

Attachment K

FUGITIVE EMISSIONS DATA SUMMARY SHEET

The FUGITIVE EMISSIONS SUMMARY SHEET provides a summation of fugitive emissions. Fugitive emissions are those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening. Note that uncaptured process emissions are not typically considered to be fugitive, and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET.

Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions).

	APPLICATION FORMS CHECKLIST - FUGITIVE EMISSIONS
1.)	Will there be haul road activities?
	☐ Yes No
	☐ If YES, then complete the HAUL ROAD EMISSIONS UNIT DATA SHEET.
2.)	Will there be Storage Piles?
	☐ Yes No
	$\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ $
3.)	Will there be Liquid Loading/Unloading Operations?
	☐ Yes No
	$\hfill \square$ If YES, complete the BULK LIQUID TRANSFER OPERATIONS EMISSIONS UNIT DATA SHEET.
4.)	Will there be emissions of air pollutants from Wastewater Treatment Evaporation?
	☐ Yes No
	☐ If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.
5.)	Will there be Equipment Leaks (e.g. leaks from pumps, compressors, in-line process valves, pressure relief devices, open-ended valves, sampling connections, flanges, agitators, cooling towers, etc.)?
	☐ Yes No
	$\hfill \square$ If YES, complete the LEAK SOURCE DATA SHEET section of the CHEMICAL PROCESSES EMISSIONS UNIT DATA SHEET.
6.)	Will there be General Clean-up VOC Operations?
	☐ Yes
	☐ If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.
7.)	Will there be any other activities that generate fugitive emissions?
	☐ Yes No
	☐ If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET or the most appropriate form.
	ou answered "NO" to all of the items above, it is not necessary to complete the following table, "Fugitive Emissions mmary."

Attachment L R200 Ware Inc. Rental Boiler Emission Unit Data Sheet

(INDIRECT HEAT EXCHANGER)

Control Device ID No. (must match List Form): CD 200 Low NOx Burner

Equipment Information

1. Manufacturer: Babcock & Wilcox	2. Model No.: RB-747 Serial No.: 201-3293					
3. Number of units: 1	4. Use: To generate steam and electricity.					
5. Rated Boiler Horsepower: hp	6. Boiler Serial No.: 201-3293					
7. Date constructed: 2000	Date of last modification and explain: 2008 Re-tubed boiler in 2008					
9. Maximum design heat input per unit:	10. Peak heat input per unit:					
99.9 ×10 ⁶ BTU/hr	×10 ⁶ BTU/hr					
11. Steam produced at maximum design output:	12. Projected Operating Schedule:					
~750,000 LB/hr	Hours/Day 24					
~/30,000 Lb/III	Days/Week 7					
~750 psig	Weeks/Year 52					
13. Type of firing equipment to be used: Pulverized coal Spreader stoker Oil burners Natural Gas Burner Others, specify	14. Proposed type of burners and orientation: (9 total burners) Vertical Front Wall Opposed Tangential Others, specify					
15. Type of draft: ⊠ Forced ☐ Induced	16. Percent of ash retained in furnace: NA %					
17. Will flyash be reinjected? ☐ Yes ☐ No	18. Percent of carbon in flyash: NA %					
Stack or	Vent Data					
19. Inside diameter or dimensions: 5 ft.	20. Gas exit temperature: ~350 °F					
21. Height: 27 ft.	22. Stack serves: ☑ This equipment only					
23. Gas flow rate: 23,583 ft³/min	Other equipment also (submit type and rating of all other equipment exhausted through this					
24. Estimated percent of moisture: ~10 %	stack or vent)					

Fuel Requirements

25.	Туре		Natural Gas
	Quantity (at Design Output)		91,000 scfh
	Annually		$797.16 \times 10^6 \text{ft}^3/\text{yr}$
	Sulfur		NA
	Ash (%)		NA
	BTU Content		pipeline quality ~1,020 BTU/ft ³
	Source		Blue Racer
	Supplier		Blue Racer
	Halogens (Yes/No)		No
	List and Identify Metals		NA
26.	Gas burner mode of control:	utomatic hi-low	27. Gas burner manufacture: COEN
		utomatic on-off	28. Oil burner manufacture: NA
29.	If fuel oil is used, how is it atomized		sed Air 🔲 Rotary Cup
30.	Fuel oil preheated:	□ No	31. If yes, indicate temperature: °F
32.	above actual cubic feet (ACF) per u	nit of fuel:	for combustion of the fuel or mixture of fuels described
33	@ °F, Emission rate at rated capacity:	PSIA lb/hr	
	Percent excess air actually required		
от.	T crocin excess an actually required	Coal Char	
35.	Seams: NA		
36.	% (of Fixed Carbon: of Moisture: of Ash:	% of Sulfur: % of Volatile Matter:

Emissions Stream

Pollutant	Pounds per Hour lb/hr	grain/ACF	@ °F	PSIA
СО	7.493			
Hydrocarbons	NA			
NO _x	3.646			
Pb	NA			
PM ₁₀	2.19			
SO ₂	NA			
VOCs	0.4			
CO ₂ e	11,722			
Pollutant	Pounds per Hour lb/hr	grain/ACF	@ °F	PSIA
CO				
Hydrocarbons	No controls	are installed besides	the low NOv hurne	re
NO _x	Two condois	are instance besides	the low ivox burne	13.
Pb				
PM ₁₀				
SO ₂				
VOCs				
Other (specify)				
-				
9				
. How will waste material NA	from the process and control	equipment be dispo	sed of?	
. Have you completed an	Air Pollution Control Device S	Sheet(s) for the contr	ol(s) used on this E	mission Unit.

Proposed Monitoring, Recordkeeping, Reporting, and Testing Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.
MONITORING PLAN: Please list (1) describe the process parameters and how they were chosen (2) the ranges and how they were established for monitoring to demonstrate compliance with the operation of this process equipment operation or air pollution control device.
The following parameters will be monitored: fuel consumption, NO _x concentration and CO concentration.
TESTING PLAN: Please describe any proposed emissions testing for this process equipment or air pollution control device.
No emission testing is planned. However a one-time energy assessment and periodic tune-ups will be performed on the boiler.
RECORDKEEPING: Please describe the proposed recordkeeping that will accompany the monitoring.
Records of the above listed parameters will be maintained.
REPORTING: Please describe the proposed frequency of reporting of the recordkeeping.
Reports will be submitted in accordance with the requirements of 40 CFR Subpart DDDDD - NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.
Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.
Additional information available on-site.



Microbac Laboratories, Inc. - Erie CERTIFICATE OF ANALYSIS

Natural Gas Analysis

L - Blue Racer

17A1417

Axiall, A Westiake Company

Joe McMullen 15696 Energy Road (State Route 2) Proctor, WV 26055 **Project Name: Natural Gas Testing**

Project / PO Number: 4510089356

Received: 01/24/2017 Reported: 02/13/2017

Case Narrative

Conclusion: The moisture analysis could not be perform due to low sample pressure.

Analytical Testing Parameters

 Client Sample ID:
 Gas Line, Gas Pad

 Sample Matrix:
 Air
 Collected By:
 Tim McLaughlin

 Lab Sample ID:
 17A1417-01
 Collection Date:
 01/24/2017 11:30

Organics	Result	RL	Units	Note	Prepared	Analyzed
Method: ASTM D1072-06						
Total Sulfur	< 0.0062		% w/v		02/13/17 1232	02/13/17 1232
Method: ASTM D1072-90						
Total Sulfur	< 2	0.0	gr/100 ft ³		02/13/17 1232	02/13/17 1232
Method: ASTM D1945-91/D3588-98						
Iso-Butane (2-methyl-propane)	<0.05	0.05	% (mole)			02/08/17 1444
Specific Gravity	0.6129826		~			02/08/17 1444
BTU, Dry	1052.68		BTU/ft³			02/08/17 1444
BTU, Net, Dry	950.26		BTU/ft³			02/08/17 1444
BTU, Net, Saturated	933.73		BTU/ft³			02/08/17 1444
BTU, Saturated	1034.36		BTU/ft³			02/08/17 1444
Density, g/ml	0.0007510		g/mL			02/08/17 1444
Density, lbs/ft³	0.0468856		lbs/ft³			02/08/17 1444
Methane	87.74	5.00	% (mole)			02/08/17 1444
Nitrogen, Wt. %	4.41	0.30	Wt. %			02/08/17 1444
Ethane	9.11	0.10	% (mole)			02/08/17 1444
Propane	0.21	0.04	% (mole)			02/08/17 1444
n-Butane	<0.05	0.05	% (mole)			02/08/17 1444
Isopentane	< 0.03	0.03	% (mole)			02/08/17 1444
n-Pentane	< 0.03	0.03	% (mole)			02/08/17 1444
Hexane	<0.01	0.01	% (mole)			02/08/17 1444
Carbon dioxide	0.14	0.02	% (mole)			02/08/17 1444
Nitrogen	2.79	0.10	% (mole)			02/08/17 1444
Method: Detector Tube						
Hydrogen Sulfide	<0.5	0.5	ppm		02/09/17 1224	02/09/17 1224

Definitions

RL: Reporting Limit



Microbac Laboratories, Inc. - Erie CERTIFICATE OF ANALYSIS 17A1417

Report Comments

Samples were received in proper condition and the reported results conform to applicable accreditation standard unless otherwise noted.

The data and information on this, and other accompanying documents, represents only the sample(s) analyzed. This report is incomplete unless all pages indicated in the footnote are present and an authorized signature is included.

Reviewed and Approved By:

Ladrea Browsfield

Andrea Brownfield Project Manager

andrea.brownfield@microbac.com

02/13/2017 15:47

304-455-2200 x 3438 Joe Mamuer

⟨∅⟩ MICROBAC™

Microbac Laboratories, Inc. - Erie 1962 Wager Road Erie, PA 16509

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Phone: (814) 825-8533 Fax: (814) 825-9254

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3trix Codes:	Aq=Air		Preserv. Codes: none=None	9

Preserv. Codes: none=None Cont. Codes

inter Field Test Results in Comments

140=Tedlar Bag / SUMMA,71=Gas Cylinder,96=Large Gas Cylinder

QC434 V2

Attachment N Supporting Emissions Calculations

Emission factors for the Ware Rental Boiler were provided by Ware Inc. (See Ware Inc. attachment)

CO2, CH4, and N2O Emissions factors from AP42 Table 1.4-2

CO2 Equivalents

The following conversion factors for CO2e were applied to the CO2, CH4, and N2O emissions

1 ton CO2 = 1 ton CO2e

1 ton CH4 = 21 ton CO2e

1 ton N2O = 310 ton CO2e



Table D-1 Emissions Calculations for Ware Rental Boiler Natural Gas, 99.9 mmBtu/hr, 8760 Annual Hours of Operation

	Emission Factor lbs/MMBtu		posed ssions	PSD Criteria	Exceed Criteria
Pollutant	(provided by Manufacturer)	lb/hr	tons/yr	Limit, tons/yr	Limit (Yes/No)
NOx	0.0365	3.646	15.97	40	No
СО	0.075	7.493	32.82	100	No
SO2	NA	-	-	40	No
PM	0.005	0.5	2.19	25	No
PM10	0.005	0.5	2.19	15	No
PM2.5	0.005	0.5	2.19	10	No
VOC	0.004	0.4	1.75	40	No

Attachment O Monitoring/Recordkeeping/Reporting/Testing Plans

The Powerhouse will maintain records of the natural gas flow to the Ware Rental Boiler to determine the heat input. The number of startup and shutdown cycles will be monitored and recorded.

An energy assessment and a boiler tune-up will be conducted and the reports will be submitted in accordance with the work practice requirements of 40 CFR 63 Subpart DDDDD.

Attachment P Public Notice

The below Legal Advertisement will be published in the Moundsville Daily Echo newspaper. The affidavit from the publication will be mailed to the WV DEP Division of Air Quality upon receipt to accompany this permit application.

AIR QUALITY PERMIT NOTICE Notice of Application

Notice is given that Axiall Corporation/Eagle Natrium LLC has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a modification permit for a portable boiler to be located on 15696 Energy Road, Proctor, WV 26055 near New Martinsville in Marshall County, West Virginia. The latitude and longitude coordinates are: 39.748056 and -80.848889.

The applicant estimates an increase in potential to discharge the following regulated air pollutants: 15.97 tons per year Nitrogen Oxides, 32.82 tons per year Carbon Monoxide, 6.57 tons per year PM, 1.75 tons per year VOC, and 51,344 tons per year CO2e.

Commencement of the modification activities is planned to begin on or about the 17th day of April, 2017. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1250, during normal business hours. Dated this 17^h day of February 2017.

By: Axiall Corporation
Eagle Natrium, LLC
Jerry Mullens
Works Manager
P.O. 191
New Martinsville, WV 26155